

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

CHELSEA GILLIAM, *et al.*,

*

Plaintiffs,

*

v.

Civil Action No. 1:23-cv-1047

*

DEPARTMENT OF PUBLIC SAFETY
AND CORRECTIONAL SERVICES, *et al.*,

*

Defendants.

* * * * *

DECLARATION OF EVE L. HILL

1. I am over 18 years of age and competent to make this declaration. All statements herein are based on my personal knowledge.

2. I am an attorney at Brown Goldstein & Levy, LLP.

3. I am one of the attorneys representing Chloe Grey.

4. On March 23, 2024, I received a letter from Ms. Grey dated March 7, 2024, informing me that she had learned the identity of the officer that sexually harassed her and propositioned her for oral sex as Ms. Grey outlines in paragraph 43 of her February 22, 2024 declaration (ECF No. 95-5). A true and accurate copy of this letter is attached hereto as Exhibit A.

5. On March 13, 2024, I received notice that DPSCS decided to place Ms. Grey on Housing Unit 2 at North Branch Correctional Institution.

6. Because I believe this placement would be detrimental to the safety of Ms. Grey, I immediately emailed opposing counsel to express my concerns. Assistant Attorney General Kelly

Donoho responded five hours later. A true and correct copy of this email exchange is attached hereto as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 19, 2024



Eve L. Hill